

## UNITED STATES DISTRICT COURT

for the

Southern District of Georgia

Civil Division

FILED  
U.S. DISTRICT COURT  
BRUNSWICK DIV.

2019 OCT 22 AM 10:22

CLERK Casbell  
SO. DIST. OF GA.

Case No. \_\_\_\_\_

(to be filled in by the Clerk's Office)

Lord James Christopher

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Glynn County, Glynn County Sheriff's Department,  
Glynn County Superior Court, Jackie Johnson,  
Anthony L. Harris, E. Neal Jump, Glynn County  
Assistant District Attorney (unknown)

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## COMPLAINT AND REQUEST FOR INJUNCTION

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Lord James Christopher
Street Address	128 Edgewater Trail
City and County	Canton, Cherokee County
State and Zip Code	Georgia 30115
Telephone Number	973.573.9922
E-mail Address	lordjchristopher@gmail.com

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Defendant No. 1

Name	Glynn County
Job or Title <i>(if known)</i>	Municipality
Street Address	W. Harold Pate Building, 1725 Reynolds Street, Suite 302
City and County	Brunswick, Glynn County
State and Zip Code	Georgia 31520
Telephone Number	912-554-7401
E-mail Address <i>(if known)</i>	n/a

## Defendant No. 2

Name	Glynn County Sheriff's Department
Job or Title <i>(if known)</i>	Public Service
Street Address	100 Sulphur Springs
City and County	Brunswick, Glynn County
State and Zip Code	Georgia 31520
Telephone Number	912-554-7600
E-mail Address <i>(if known)</i>	n/a

## Defendant No. 3

Name	Glynn County Superior Court
Job or Title <i>(if known)</i>	Judicial Branch of Municipality
Street Address	701 H Street #103
City and County	Brunswick, Glynn County
State and Zip Code	Georgia 31520
Telephone Number	912-554-7272
E-mail Address <i>(if known)</i>	n/a

## Defendant No. 4

Name	see attachment 1
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*



Federal question



Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

See attachment 2

**B. If the Basis for Jurisdiction Is Diversity of Citizenship****1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, (name) n/a, is a citizen of the  
State of (name) n/a.

**b. If the plaintiff is a corporation**

The plaintiff, (name) n/a, is incorporated  
under the laws of the State of (name) n/a,  
and has its principal place of business in the State of (name)  
n/a.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

**2. The Defendant(s)****a. If the defendant is an individual**

The defendant, (name) n/a, is a citizen of  
the State of (name) n/a. Or is a citizen of  
(foreign nation) n/a.

b. If the defendant is a corporation

The defendant, (name) n/a, is incorporated under  
the laws of the State of (name) n/a, and has its  
principal place of business in the State of (name) n/a.  
Or is incorporated under the laws of (foreign nation) n/a,  
and has its principal place of business in (name) n/a.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

n/a

### III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur?

See attachment 3

B. What date and approximate time did the events giving rise to your claim(s) occur?

See attachment 3

- C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

See attachment 3

---

#### IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

This court recognizes constitutional rights violations as irreparable harm. As stated above in the facts of this matter Plaintiff is currently suffering multiple constitutional rights violations. 4th, 5th, 6th, 8th, and 14th amendments that Plaintiff has the constitutional right to enjoy are being violated by the Defendants. Plaintiff seeks immediate stay of prosecution as preliminary injunctive relief and the complaint stricken/dismissed, bar of prosecution, and/or any other remedy available to this court and that this court seems fair and just as permanent injunctive relief. Also, Plaintiff requests preliminary injunctive relief to demand the Defendants to provide all records pertaining to case number CR-1800318. This evidence is vital in proving the material facts associated with this complaint. Plaintiff understands the factors weighed in the evaluation of whether injunctive relief should issue. Plaintiff prays that this court will recognize that the scale for injunctive relief weighs heavily in Plaintiff's favor.

---

#### V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

(1). A declaration that the acts and omissions described herein violated Plaintiff's rights under the constitution and laws of the United States. (2). Immediate stay of prosecution as preliminary injunctive relief as well as to demand the Defendants to provide all records pertaining to case number CR-1800318. (3). Plaintiff seeks permanent injunctive relief to have complaint stricken/dismissed, bar of prosecution, and/or any other remedy available to this court and that this court seems fair and just in case number CR-1800318. (4). Compensatory damages of \$216,750.00 for loss of wages stemming from defamation, \$216,750.00 as pain and suffering stemming from cruel and unusual punishment due to excessive and oppressive restraint on liberty, \$2,500.00 for Plaintiff's expenses in dealing with Defendants and case number CR-1800318 (traveling expenses, bond, etc.). (5). \$433,500.00 for punitive damages stemming from the combined violation of Plaintiff's constitutional rights by all Defendants involved. (6). A trial by jury on all matters triable by jury. (7). Plaintiff's costs in this suit. (8). Any additional relief this court deems just, proper, and equitable.

---

**VI. Certification and Closing**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

**A. For Parties Without an Attorney**

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 10/11/2019

Signature of Plaintiff

Printed Name of Plaintiff

[Signature]  
Lord James Christopher

**B. For Attorneys**

Date of signing: \_\_\_\_\_

Signature of Attorney	<u>n/a</u>
Printed Name of Attorney	<u>n/a</u>
Bar Number	<u>n/a</u>
Name of Law Firm	<u>n/a</u>
Street Address	<u>n/a</u>
State and Zip Code	<u>n/a</u>
Telephone Number	<u>n/a</u>
E-mail Address	<u>n/a</u>